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6 Counsel for Defendant,
Billy Khounthavong
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8 UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 BILLY KHOUNTHAVONG,
14 BENNY KHOUNTHAVONG, and
JOHNNY KHOUNTHAVONG,
15 Defendants.
16

Case No. CR 13-904-R-1, 2, 3

STIPULATION BY THE
GOVERNMENT AND ALL
DEFENDANTS REGARDING
ADMISSION OF CERTAIN
DEFENSE EXHIBITS

17 It is hereby stipulated and agreed, by and between plaintiff United States
18 of America, by and through its counsel of record, the United States Attorney for
19 the Central District of California, and all defendants, by and through their
20 respective counsel of record that:
21

22 All defense exhibits listed in Exhibit "A", attached hereto are (1) true,
23 accurate and complete copies of the original documents; (2) genuine and
24 authentic; and (3) admissible at the trial in this matter without any further
25 evidentiary foundation being laid. Moreover, objections on the grounds of
26 authenticity, hearsay, lack of foundation, relevance, and other grounds
27 shall be deemed overruled, with the exception of two defense exhibits, as
28 follows:

1 Exhibit 206, which is a MLS listing and Exhibit 219, which is an
2 excerpt of the Los Angeles County Sheriff's Department Handbook,
3 as to these two exhibits, the government only retains an objection
4 based on relevance.

5 IT IS SO STIPULATED.

6 Dated: January 20, 2015

7 STEPHANIE YONEKURA
Acting United States Attorney

8 ROBERT E. DUGDALE
9 Assistant United States Attorney
Chief, Criminal Division

10 /s/ per telephonic authorization

11
12 MARGARET L. CARTER
13 LAWRENCE S. MIDDLETON
Assistant United States Attorneys

14 Attorneys for Plaintiff,
15 United States of America

16 /s/ *Dominic Cantalupo*

17 Dated: January 20, 2015

18 DOMINIC CANTALUPO
19 Counsel for Defendant,
Billy Khounthavong

20 /s per telephonic authorization

21 Dated: January 20, 2015

22 ADAM H. BRAUN
23 Counsel for Defendant,
Benny Khounthavong

24 /s/ per telephonic authorization

25 Dated: January 20, 2015

26 HUMBERTO DIAZ
27 Counsel for Defendant,
Johnny Khounthavong

EXHIBIT A

DEFENSE TRIAL EXHIBITS

(UNITED STATES V. BILLY KHOUNTHAVONG, ET AL.)

Def. Ex. No.	Description	Marked for Identification	Admitted
201	Example of Improvements to Chino Home (WoodWork Invoice Dated 3/09/06)		
202	Example of Improvements to Chino Home (WoodWork Invoice Dated 3/21/07)		
203	Bank of America Statement Reflecting Cost of Additional Improvements to Chino Home		
204	Homeowner's Premium for Chino Home and Payment for Policy Period 3/28/11 through 3/26/12		
205	Bank of America Correspondence Regarding Loan Modification on Chino Home (Dated 10/17/11)		
206	MLS Listing for 4 Bedroom Home in Corona, CA (Dated 4/21/11)		
207	E-mail from Natalie Tran to Billy Khounthavong (Dated 6/23/11) Regarding Signing of Loan Application and Deposit for Corona Home		

208	E-mail from Natalie Tran to Billy K. (Dated 7/12/2011) Regarding DBR's Draft Letter of Explanation for Corona Loan		
209	Mobile Phone Records for Natalie Tran (subscribed under name "Lily Dang" and mobile number (714) 829-6963) for 7/18/11 between the hours of 3:00 p.m. and 11:59 p.m.; 10/20/14 Cover Letter with Production of Phone Records		
210	Natalie Tran's Direct Lender Company Listing and Direct Bank Rate Website Listing Mobile Number (714) 829-6963 As Her Phone Number		
211	Subscriber Information for Mobile Phone of Notary Laura Meadows (310) 753-7220		
212	Map of Los Angeles and Orange Counties		
213	Work Shift Records for Johnny Khouthavong (7/18/11 shift from 5:20 through 13:00 and 13:00 through 21:00)		
214	Work Shift Records for Billy Khounthavong (shift from 7/18/11 at 22:00 through 7/19/11 at 6:00)		
215	Complete Loan Package for Purchase of Corona Home (Dated 7/18/11)		

216	Commission to Natalie Tran/First Realty Tree for Purchase of Corona Home (Dated 6/27/11)		
217	Fee to Direct Lending/Natalie Tran for Loan to Purchase Corona Home (Dated 6/03/11)		
218	Commission Paid to Natalie Tran for Short Sale on Chino Home ("Payable to Thai Le") (Dated 1/24/12)		
219	Excerpt of Los Angeles County Sheriff's Department Handbook Regarding Civil Lawsuits Against Deputies		
220	Letter to Billy Khounthavong from Union Attorneys Regarding <i>Grubbs</i> Civil Lawsuit (Dated 4/15/11)		
221	Letter to Benny Khounthavong from Union Attorneys Regarding <i>Grubbs</i> Civil Lawsuit (Dated 4/15/11)		
222	Letter from County of Los Angeles to Billy Khounthavong Regarding County's Indemnification and Representation of Billy Khounthavong in <i>Grubbs</i> Lawsuit (Dated 6/28/11)		

223	Letter from County of Los Angeles to Benny Khounthavong Regarding County's Indemnification and Representation of Benny Khounthavong in <i>Grubbs</i> Lawsuit (Dated 6/28/11)		
224	County of Los Angeles Approval of Settlement of <i>Grubbs</i> Lawsuit and County's Payment of All Settlement Costs (Dated 2/6/12) [REDACTED]		
225	E-mail from Natalie Tran to Khounthavongs Entitled "Congratulations Boys =)" (Dated 7/19/11 at 2:50 a.m.)		
226	Billy Khounthavong's Discover Credit Card Statements Covering July 25, 2011 through October 24, 2011		
227	Billy Khounthavong's Chase Checking Account Statement Covering July 21, 2011 through August 16, 2011		
228	E-mail from Jennie Nguyen (Direct Lending) to Khouthavongs Entitled "Short Sale Requirement for Garden Park Chino" (Dated 8/2/11)		
229	E-mail from Jennie Nguyen (Direct Lending) to Khouthavongs Entitled "Garden Park need updated information" (for short sale) (Dated 8/25/11)		

230	E-mail from Natalie Tran (Direct Lending/First Realty Tree) to Khounthavongs Entitled "Updated Documents needed" (Dated 10/20/11)		
231	8/2/11 Offer from Potential Buyer of Chino Home Regarding Potential Buyer's Proof of Adequate Funds		
232	8/21/11 All Cash Offer from Second Potential Buyer of Chino Home		
233	9/7/11 Offer from Third Potential Buyer of Chino Home		
234	Signed Daily Time Card for Billy Khounthavong for Shift from July 18, 2011 at 22:00 through July 19, 2011 at 6:00		
235	Billy Khounthavong's Work Shift Records Reflecting He Did Not Work 4/1/11 through 4/5/11 at 22:00; Returned to Work for a Shift on 4/5/11 at 22:00 through 4/6/11 at 6:00		
236	Benny Khounthavong's Work Shift Records Reflecting He Did Not Work 4/1/11 through 4/6/11; Returned to Work 4/7/11		
237	Partial Handwritten Benny Khounthavong URLA Signed 4/3/11 with Fax Header 4/4/11		
238	Complete Loan Package Dated 6/22/11		

239	Excerpts of Joint Chase (formerly Washington Mutual) Checking Account Statements from 2006 and from January through July 2011		
240	E-mail from Natalie Tran (Direct Lending/First Realty Tree to J. Khounthavong (Dated 4/21/11)		
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